

REMARKS

Applicants have considered the Office Action dated November 14, 2007, rejecting all of the pending claims (1-20). Applicants have also considered the reference upon which the Office Action's rejection of claims 1-20 is based. Applicants have amended the claims to more clearly identify the subject-matter of Applicants' invention. More particularly, the subject-matter of claims 2 and 3 is now incorporated into claim 1. Applicants respectfully submit that the combination of elements of claims 1-3 of the previously pending claims (now claim 1) is non-obvious over the prior art. Applicants therefore request favorable reconsideration of the Office Action's grounds for rejecting the previously pending claims in view of Applicants' amendments to the previously pending claims and the Remarks provided herein below. Please charge any fee deficiencies to Deposit Account No. 12-1216.

Summary of the Rejections

1. Claims 1-20 are rejected as obvious under 35 U.S.C. §103(a) over Tsunoda et al. U.S. Pat. No. 4,952,031 (hereinafter Tsunoda).

The Rejection of Claims 1-20 as Obvious Over Tsunoda

Applicants traverse the rejection of **claim 1 (a combination of former claims 1-3)** over the teachings of Tsunoda since Tsunoda does not disclose or suggest all of the recited claim elements (in particular the claimed capacitive or inductive signal coupling through the substrate). Tsunoda discloses an LCD display comprising a set of lateral electrodes and a set of longitudinal electrodes (oriented orthogonally to the lateral set of electrodes). The two sets of electrodes are carried on two separate substrates. A scanning signal that addresses one of the lateral electrodes is supplied to a scanning signal bus. The scanning signal bus is, in turn, connected to each of the lateral electrodes via an optically activated switch. A video signal that is to be supplied to one of the longitudinal electrodes is supplied to a display signal bus which is connected to each one of the set of longitudinal signal buses. The optically activated switches are selectively activated by irradiation of an optical beam and the scanning signal and the video signal are supplied to the addressed electrodes.

Thus Tsunoda discloses an LCD display having a relatively complex construction because it requires an electrical control signal to be converted into an optical control signal by a light emitting device. The optical signal is thereafter reconverted into an electrical signal

by an optically activated switch. The signal propagation design in Tsunoda obviates the use of direct mechanical connections at the cost of enhanced complexity and introduction of a source of malfunction (i.e., LEDs).

The claimed invention includes a transport mechanism, for passing a signal from the carrier conductors to the display conductors located on opposing sides of a same substrate, which utilizes either capacitive or inductive signal coupling. The display conductors and the carrier conductors are positioned respectively to obtain capacitive or inductive signal coupling relationships between associated ones of the display conductors and the carrier conductors. The substrate thus comprises either a dielectric (capacitive coupling) or inductive medium of a transformer. Applicants' claimed substrate's presence is essential to the proper operation of the display since it provides either a dielectric (capacitive coupling) or inductor (inductive coupling) medium through which the signal propagates.

Applicants' claimed invention recites capacitive and magnetic coupling of a signal wherein the substrate's presence is needed to facilitate the signal transport between corresponding signal conductors. Nowhere does Tsunoda disclose or suggest the claimed capacitive and inductive signal coupling between the display and carrier conductors. Instead, Tsunoda merely discloses an optical coupling arrangement. To be clear, Applicants note that their claimed invention calls for the capacitive or inductive coupling to be through the *substrate*. Thus, the capacitor "c" in FIG. 12 of Tsunoda does not correspond to the claimed capacitive coupling via the substrate.

In conclusion with regard to the rejection of **claim 1**, Applicants agree that Tsunoda does indeed disclose "optical coupling" through a substrate. Applicants have amended the claims to explicitly exclude "optical coupling" via the substrate. Tsunoda neither discloses nor suggests the claim element of capacitive or inductive coupling via the substrate that separates carrier and display conductors on an LCD display. The Office Action has therefore not established a *prima facie* case of obvious with regard to Applicants' claimed invention.

For at least the reasons stated herein above. Presently pending claims 4-16 and 18-20 are also patentable over Tsunoda.

Applicants traverse the rejection of **claim 4**. Tsunoda discloses an arbitrarily thick "optical" transmission medium that contemplates thicknesses substantially greater than 250 microns (0.25 mm).

Applicants traverse the rejection of **claim 7** for at least the additional reason that Tsunoda does not disclose the recited "pads" placed on opposing sides of the substrate to provide the claimed capacitive coupling through the substrate.

Applicants traverse the rejection of **claim 10** for at least the additional reason that Tsunoda does not disclose the claimed "first", "second", and "third" transistors. The transistors referenced in the Office Action are associated with multiple alternative implementations of the switching circuit 26a. The transistors are not present as first, second and third transistors in a single embodiment.

Applicants traverse the rejection of **claim 13** since Tsunoda does not disclose a means for capacitively or inductively coupling power. The capacitor C of the circuit in FIGs. 11 and 12 of Tsunoda does not perform the claimed function of powering the display.

Applicants traverse the rejection of **claim 14** since Tsunoda does not even disclose the claimed capacitively coupled pads defining a capacitor that is substantially larger than a capacitor required to transmit a signal between carrier and display conductors.

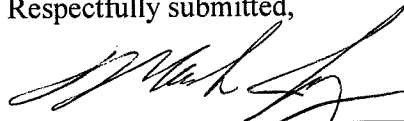
Applicants similarly traverse the rejection of **claims 15 and 16** since Tsunoda neither discloses nor suggests the claimed inductive coupling for supplying the power for the display circuit. The reference to the elements 26a does not correspond to the claimed "cooperating inductors" since the circuits neither carry out an inductive function nor do they cooperate. The inductors 26a operate independently without regard to one another.

Applicants traverse the rejection of **claims 19 and 20** for at least the additional reason that Tsunoda does not disclose the claimed "rectifier".

Conclusion

Applicants respectfully submit that the patent application is in condition for allowance. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,



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